

## SECOND LAYER OF THE PRIVACY POLICY FOR ADMISSION AND ACCESS

**Gran Casino de las Palmas, S.A.** wishes to provide clients who enter the casino of the CIRSA Group (hereinafter, "**Clients**") with this additional information on data protection (hereinafter, the "**Privacy Policy**"); here, we provide in a simple and transparent manner all information about the processing operations which we undertake with respect to the personal data, the purposes for which we process the data, the legal bases qualifying us to do so, the periods for which we store the data and the rights which may be exercised by you. This Privacy Policy will be available at all times on the website <https://www.cirsa.com/politicas-privacidad-retail-grupo-cirsa/> hereinafter, the "**Website**").

### **1. WHO IS THE DATA CONTROLLER?**

The Data Controller (No. 1, 2, 3, 4 and 5) is the CIRSA Group Company responsible for the casino that you are entering (hereinafter, the "**Casino**"), more specifically Gran Casino de las Palmas, S.A., established in accordance with Spanish legislation, whose Tax ID is A35101732 and whose business address is Calle Simón Bolívar, 3 – 35007, Las Palmas de Gran Canaria (Las Palmas), registered with the Registro Mercantil de Valencia (hereinafter, "**We**").

The Data Controller (No. 6) is the CIRSA Group Company, more specifically CIRSA Servicios Corporativos S.L., established in accordance with Spanish legislation, whose Tax ID is B25421199 and whose business address is Carretera de Castellar, 298 – 08226 Terrassa (Barcelona), registered with the Registro Mercantil de Barcelona.

If you have any doubts about the processing operations which we undertake with respect to your personal data, you can contact us by sending an email to [protecciondedatos@cirsa.com](mailto:protecciondedatos@cirsa.com).

### **2. WHAT IS PERSONAL DATA AND DATA PROCESSING?**

Personal data is any information relating to an identified or identifiable natural person. An identifiable natural person will be considered to be any person who can be identified, directly or indirectly, in particular by reference to an identifier such as for example a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. The processing of personal data is any operation or set of operations which we

undertake with respect to your personal data, such as for example the collection, recording, storage, use and communication of your data.

### **3. WHICH CHANNELS DO WE USE TO COLLECT YOUR PERSONAL DATA?**

We collect personal data from Clients through the following channels:

- Presentation of a personal identity document issued by a government authority.
- Completion of the admission and access form.
- Video surveillance systems installed in our facilities.
- Channel provided by the relevant Autonomous Community with regard to the registered data of persons barred from entry.

### **4. WHAT PROCESSING OPERATIONS DO WE UNDERTAKE WITH RESPECT TO CLIENTS' PERSONAL DATA?**

To facilitate the provision of the information that may lawfully be sought on the processing which we undertake with respect to Clients' personal data, we have set out the personal data which we process, the processing operations which we undertake, the purposes, the basis qualifying us to do so and the periods for which we store the data in detail in the tables that follow. All of this is set out in a manner tailored to each processing operation in the following tables.

## 1. Admission and access control

<p><b>For which purposes do we process your personal data?</b></p>	<ul style="list-style-type: none"> <li>• To comply with the applicable regulations regulating access to casinos.</li> <li>• To control admission to and monitor the premises and entrances to the premises, as well as the people on site, in accordance with the legislation applicable in the relevant Autonomous Community.</li> <li>• To prevent access to minors and those included on the register of persons barred from entering gambling establishments, as well as any other person who is barred from entry in accordance with the regulations applicable in the relevant Autonomous Community.</li> </ul>
<p><b>Which personal data do we process?</b></p>	<ul style="list-style-type: none"> <li>• Identity data: Surname and first name(s), full address of the document holder and number of the identity document shown.</li> <li>• Identity data associated with a ban on gambling.</li> <li>• Contact details: email address and/or mobile phone number.</li> <li>• Other identity data: signature and biometric data from the signature.</li> </ul>
<p><b>On what basis are we qualified to process data?</b></p>	<ul style="list-style-type: none"> <li>• Compliance with a legal obligation which may be imposed on the Data Controller:             <ul style="list-style-type: none"> <li>○ Royal Decree 204/2001, of 3 December, (BOC [Official Gazette] No. 162 of 17/12/2001), approving the Canary Islands Gambling Casinos Regulations.</li> <li>○ Gambling and Betting Law 8/2010, of 15 July.</li> </ul> </li> </ul>
<p><b>For which periods do we store your personal data?</b></p>	<ul style="list-style-type: none"> <li>• The personal data provided will be stored for the period provided for by law and/or for the limitation period for any actions that may be brought as a consequence of the processing of your personal data.</li> </ul>

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|  | <ul style="list-style-type: none"><li>• Once the maximum period for which we store the data has elapsed, we shall delete or anonymise your personal data.</li></ul> |
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## 2. Video surveillance

<p><b>For which purposes do we process your personal data?</b></p>	<ul style="list-style-type: none"> <li>• To maintain and guarantee staff safety and the security of assets at entrances and throughout the establishment.</li> </ul>
<p><b>Which personal data do we process?</b></p>	<ul style="list-style-type: none"> <li>• Identity data: image.</li> </ul>
<p><b>On what basis are we qualified to process data?</b></p>	<ul style="list-style-type: none"> <li>• The processing is necessary to protect the vital interests of the data subject or any other natural person.</li> <li>• The processing is necessary for the completion of a task performed in the public interest.</li> <li>• Organic Law 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights.</li> <li>• Compliance with a legal obligation which may be imposed on the Data Controller. All establishments whose security system is classed as level 3 (inter alia, Casinos) are obliged to comply with the provisions of Royal Decree 2364/1994, of 9 December, approving Private Security Regulations; those of Articles 111 et seq. and of Order INT 317/2011, which set out the measures of protection for each establishment, both physical and electronic. Moreover, they must have a CCTV system with access from the Alarm Reception Centre.</li> </ul>
<p><b>For which periods do we store your personal data?</b></p>	<ul style="list-style-type: none"> <li>• We shall process your personal data for as long as this is necessary for our video surveillance purposes and we shall store the data for a period of one (1) month.</li> <li>• Once the maximum period for which we store the data has elapsed, we shall permanently delete your personal data.</li> </ul>

**3. Examination of gambling operations for the control and prevention of fraud, money laundering and the financing of terrorism.**

<p><b>For which purposes do we process your personal data?</b></p>	<ul style="list-style-type: none"> <li>• To verify the Client's identity and the methods of payment used.</li> <li>• To look into the origin of funds, and to monitor, detect, prevent and/or report fraudulent and/or criminal conduct if it is suspected that a fraudulent payment has been made, including with the use of stolen credit cards, or where there is any other suspected fraudulent activity.</li> <li>• To keep the Casino secure.</li> <li>• To communicate as required with the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences.</li> <li>• To retain your personal data required in accordance with the regulations regulating the prevention of fraud, money laundering and the financing of terrorism, and any other applicable regulations, and for the establishment, exercise or defence of any legal claims which you may bring during the limitation period for actions brought as a consequence of the contractual relationships entered into.</li> </ul>
<p><b>Which personal data do we process?</b></p>	<ul style="list-style-type: none"> <li>• Identity data: For Spanish nationals, we may request a copy of the National Identity Document or other personal identity document issued by a government authority, provided that it has sufficient guarantees of authenticity and includes a photograph of the document holder. For foreign nationals, the Residence Permit, Foreigners' Identity Card, Passport or, in case of citizens of the European Union or of the European Economic Area, the official personal identity document or card issued by the authorities of origin. For staff from the diplomatic posts and consulates of third countries in Spain, the identity document issued by the Ministry for Foreign Affairs and Cooperation.</li> </ul>

	<ul style="list-style-type: none"> <li>• Other identity data: identity data associated with the ban on gambling.</li> <li>• Data relating to the frequency and dates of visits.</li> <li>• Data relating to the gambling operations performed: record of transactions and gambling history, amounts paid out and winnings made.</li> <li>• Data relating to the methods of payment used.</li> <li>• Examination of possible conflicts of interest and analysis of the risks of corruption, fraud, money laundering or related risks. With regard to the analysis of risks, we would inform you that in order to undertake such an analysis, we may use personal data lawfully obtained from public registers or from certain companies, including but not limited to: Axesor, Informa, Dow Jones, Registro Mercantil and the Land Register.</li> </ul>
<p><b>On what basis are we qualified to process data?</b></p>	<ul style="list-style-type: none"> <li>• The legal basis for the processing of your data is compliance with a legal obligation imposed by Law 10/2010, of 28 April, on the prevention of money laundering and the financing of terrorism.</li> <li>• Royal Decree 304/2014, of 5 May, approving the Regulation for Law 10/2010 of 28 April on the prevention of money laundering and the financing of terrorism.</li> <li>• Law 11/2021, of 9 July, providing for measures to prevent and combat tax fraud, for the transposition of Council Directive (EU) 2016/1164, of 12 July 2016, laying down rules against tax avoidance practices that directly affect the functioning of the internal market and for the modification of various tax rules and rules relating to the regulation of gambling.</li> </ul>
	<ul style="list-style-type: none"> <li>• We shall process your personal data for as long as this is necessary to carry out the control and prevention of fraud, money laundering and the financing of terrorism.</li> </ul>

**For which periods do we store your personal data?**

- Once the existing relationship has come to an end, we shall store your personal data, duly blocked, for the period provided for by law and/or for the limitation period for any actions that may be brought as a consequence of the existing relationship.
- Likewise, we would inform you that we shall store your personal data for as long as the contractual relationship continues to exist and in any event, once it has come to an end, for a period of 10 years in accordance with Law 10/2010, of 28 April, on money laundering and the financing of terrorism.
- Once the maximum period for which we store the data has elapsed, we shall delete or anonymise your personal data.



#### 4. Pseudonymisation of data for data analysis performed for business management and statistical purposes

<p><b>For which purposes do we process your personal data?</b></p>	<ul style="list-style-type: none"> <li>• The pseudonymisation of data for the purposes of undertaking business analyses and producing business statistics. Access to the Casino will not imply the completion of segmentation or Client profiling activities. We undertake statistical analyses solely in order to obtain economic values and values relating to profitability and to the quality and improvement of services.</li> <li>• We would inform you that, in order to undertake such data processing, the Casino applies a pseudonymisation process, which consists of encoding your data in such a way that you cannot be identified as a Client without the use of additional, separate information subject to technical and organisational measures intended to ensure that the personal data is not attributed to an identified or identifiable natural person.</li> </ul>
<p><b>Which personal data do we process?</b></p>	<ul style="list-style-type: none"> <li>• Data for the pseudonymisation of data relating to the frequency and dates of visits to the Casino.</li> </ul>
<p><b>On what basis are we qualified to process data?</b></p>	<ul style="list-style-type: none"> <li>• Our legitimate interest. In any event, we would remind you that you may object to the pseudonymisation of data for the analysis of your data for business management and statistical purposes by sending an email to the address <a href="mailto:protecciondedatos@cirsa.com">protecciondedatos@cirsa.com</a>.</li> </ul>
<p><b>For which periods do we store your personal data?</b></p>	<ul style="list-style-type: none"> <li>• We shall continue to process your data unless you exercise your right to object to the processing of your data or your right to erasure.</li> <li>• We shall store your personal data, duly blocked, for the period provided for by law and/or for the limitation period for any actions that may be brought as a consequence of the processing of your personal data.</li> </ul>

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|  | <ul style="list-style-type: none"><li>• Once the maximum period for which we store the data has elapsed, we shall anonymise or delete your personal data.</li></ul> |
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## 5. Keeping lists registering data erasure and/or objections to the processing of data

<p><b>For which purposes do we process your personal data?</b></p>	<ul style="list-style-type: none"> <li>• To keep an up-to-date list of all those Clients who have requested the erasure of their data or who have at any time objected to any of the data processing operations performed by us.</li> </ul>
<p><b>Which personal data do we process?</b></p>	<ul style="list-style-type: none"> <li>• Identity data: full name.</li> <li>• Contact details: mobile phone number and/or address and/or email address.</li> <li>• Effective date of erasure.</li> </ul>
<p><b>On what basis are we qualified to process data?</b></p>	<ul style="list-style-type: none"> <li>• Compliance with a legal obligation, more specifically, Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, which obliges us to respect your rights and to preserve evidence of compliance on our part with your request to exercise the right to erasure.</li> </ul>
<p><b>For which periods do we store your personal data?</b></p>	<ul style="list-style-type: none"> <li>• We shall continue to process your data for as long as you maintain your relationship as a Client or until such time as you exercise your right to object to the processing of your data or your right to erasure.</li> <li>• Subsequently, we shall store your personal data, duly blocked, for the period provided for by law and/or for the limitation period for any actions that may be brought as a consequence of the processing of your personal data.</li> <li>• Once the maximum period for which we store the data has elapsed, we shall anonymise or delete your personal data.</li> </ul>

## 6. Dispatch of business communications

<p><b>For which purposes do we process your personal data?</b></p>	<ul style="list-style-type: none"> <li>• To dispatch non-personalised business communications for advertising and promotional purposes, subject to the express consent of the Client.</li> </ul>
<p><b>Which personal data do we process?</b></p>	<ul style="list-style-type: none"> <li>• Identity data: full name.</li> <li>• Contact details: email address and/or mobile phone number.</li> </ul>
<p><b>On what basis are we qualified to process data?</b></p>	<ul style="list-style-type: none"> <li>• The Client's consent. In any event, we would remind you that you may withdraw the consent given and object to the dispatch of non-personalised business communications for advertising and promotional purposes by writing to the email address <a href="mailto:protecciondedatos@cirsa.com">protecciondedatos@cirsa.com</a>.</li> </ul>
<p><b>For which periods do we store your personal data?</b></p>	<ul style="list-style-type: none"> <li>• We shall continue to process your data until such time as you exercise your right to object to the processing of your data or your right to erasure.</li> <li>• Subsequently, we shall store your personal data, duly blocked, for the period provided for by law and/or for the limitation period for any actions that may be brought as a consequence of the processing of your personal data.</li> <li>• Once the maximum period for which we store the data has elapsed, we shall anonymise or delete your personal data.</li> </ul>

## 5. WHICH RIGHTS CAN YOU EXERCISE?

We have set out below the rights that you can exercise:

- ✓ **Rights of access**  
You have the right to know whether we are processing your personal data and, where this is the case, to know which data it concerns.
- ✓ **Right to rectification**  
You have the right to change any data which is inaccurate or incomplete. For this, you should indicate which data you wish to change and provide sufficient evidence of this.
- ✓ **Right to object**  
Under the circumstances provided for by law, you may at any time object, on grounds relating to your particular situation, to our processing of your data. Please recall that your objection to the completion of those processing operations based on your consent or on the performance of the contract will mean that it is impossible for us to undertake such processing operations. For all those processing operations for which your consent provides the legal basis qualifying us to process the data, you may at any time object to such operations and/or at any time withdraw your consent. More specifically, you may object to the pseudonymisation and analysis of your data for business management and statistical purposes; and to the dispatch of non-personalised business communications for advertising and promotional purposes. All of this by sending an email to the address [protecciondedatos@cirsa.com](mailto:protecciondedatos@cirsa.com).
- ✓ **Right to erasure**  
This right permits your personal data to be deleted. This does not mean that your data is fully deleted, rather that your data will be stored as blocked data in such a way as to prevent it from being processed, notwithstanding the fact that it may be made available to public administrations, courts and tribunals to deal with any liabilities that may have arisen as a consequence of the processing during the limitation period for the same. If you wish to exercise the right to erasure, we would remind you that you may do so at any time by sending an email to our Data Protection Officer at the address [protecciondedatos@cirsa.com](mailto:protecciondedatos@cirsa.com).

- ✓ **Right to data portability**  
You have the right to receive and/or to transmit those personal data that concern you and that you have provided us with to another, different controller.
- ✓ **Right to the restriction of processing**  
You have the right to ask us to suspend the processing of your data whenever (i) you have contested the accuracy of your data, while we verify said accuracy; or (ii) you have exercised your right to object to the processing of your data, while we verify whether our legitimate grounds override yours as the data subject. Likewise, this right permits you to ask us to store your personal data whenever (i) the data processing is unlawful and you as the data subject oppose the erasure of your data, requesting the restriction of its use instead; or (ii) we no longer need your personal data for the purposes of the processing, but you need it for the establishment, exercise or defence of claims.

You may exercise your rights at no charge at any time by sending an email to our Data Protection Officer at the address [protecciondedatos@cirsa.com](mailto:protecciondedatos@cirsa.com), specifying which right you are exercising. If we have difficulties in identifying you, we may ask you to forward some form of identity document to us in order to confirm your identity and manage your request properly. Should you feel that we have not properly met your requirements in terms of exercising your rights, you may file a complaint with the Spanish Data Protection Agency (<http://www.aepd.es/>)

## 6. TO WHOM DO WE COMMUNICATE YOUR PERSONAL DATA?

We would likewise inform you that we may communicate your personal data to companies from the same corporate group or to any other relevant third parties who are qualified to handle, manage or deal with any claim/complaint or any other request for information, enquiry or request that you have sent us via any of our means of contact, whenever this is necessary as a consequence of said request in order to properly deal with the same.

As an example, other possible third parties to whom we may communicate your data, subject to a legal requirement or whenever the legal basis qualifying us to communicate the data is the need to comply with an applicable legal obligation or the satisfaction of a

legitimate interest pursued, said legitimate interest consisting in bringing legal action or conducting a defence against such action, include but are not limited to the following:

- Legal advisors.
- Courts and Tribunals.
- Tax Administration.
- Autonomous Consumer Agencies.
- Spanish Data Protection Agency.
- Government Agencies and the Public Administration.
- State Law Enforcement Agencies.
- To the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences. We shall communicate the personal data of those Clients who are likely to have acted in any manner likely to constitute money laundering or unlawful financing. We shall be permitted to communicate your personal data for the purposes of preventing, avoiding and/or reporting possible fraudulent, unlawful or criminal activities.

Likewise, we shall be permitted to communicate your personal data to third parties if we, or essentially all our assets, are acquired by a third party, in which case the personal data held by us will be one of the assets transferred.

## **7. WHO MAY ACCESS YOUR DATA?**

We work with suppliers or third parties necessary for the proper provision of our services and they may have access to your personal data in the course of the exercise of their activities. The obligations and responsibilities which said third parties assume in terms of the processing of the data in their capacity as Data Processors are put into proper form. In this regard, we have the corresponding data processing agreements signed by both parties and containing the due guarantees as related to the processing of personal data, confidentiality and the deletion, destruction or return of the information.

## **8. IS YOUR DATA SECURE?**

We would inform you that we adopt suitable procedures and information systems and implement the technical and organisational security measures necessary to guarantee an adequate level of security for the risks which the processing operations covered by this Privacy Policy may involve. All the information which you provide will be stored on secure servers. Likewise, once we have received all the information, we shall deploy strict security procedures to prevent any unauthorised access. At the same time, we ensure that our service providers also have adequate security standards in place for the protection of the personal data to which they have or may have access, in compliance with the data protection legislation in force at any time. We shall not transfer your personal data outside the European Economic Area.

## **9. CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may change over time due to possible changes to the criteria pursued at any time by the Spanish Data Protection Agency or other supervisory authorities, the legislative changes that may be made and the jurisprudential rulings that may prove to be applicable to this Privacy Policy. We therefore reserve the right to change this Privacy Policy to permit us to adapt it to said criteria and to jurisprudential or legislative changes.

Most recent version: 29 March 2023.